

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**JAIME VELASQUEZ-LUVIANO**  
**a/k/a JAIME LUVIANO-BENITEZ**  
**a/k/a “COLUMBIA”**  
[DOB: 10-02-1969],

**MARIA G. CRUZ-MUNIZ**  
**a/k/a “MARTA”**  
[DOB: 11-07-1980],

**CARLOS A. MARTINEZ-ACOSTA**  
[DOB: 08-10-1982],

**CHARLOTTA TODD-PEPPARD**  
[DOB: 11-16-1970],

and

**TODD PEPPARD**  
[DOB: 09-29-1970],

Defendant.

**No. 13-3120-01/05-CR-S-JFM**

**COUNTS 1 and 7**

21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(B)  
NLT 5 Years Imprisonment  
NMT 40 Years Imprisonment  
NMT \$5 million fine  
NLT 4 Years Supervised Release  
Class B Felony

**COUNTS 2 through 6**

21 U.S.C. § 841(a)(1) and (b)(1)(C)  
NMT 20 Years Imprisonment  
NMT \$1 million fine  
NLT 3 Years Supervised Release  
Class C Felony

**FORFEITURE ALLEGATION**

21 U.S.C. § 853

\$100 Mandatory Special Assessment

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT 1**

Between July 1, 2013, and November 19, 2013, said dates being approximate, in Taney County, in the Western District of Missouri and elsewhere, the defendants, **JAIME VELASQUEZ-LUVIANO a/k/a JAIME LUVIANO-BENITEZ a/k/a “COLUMBIA,” MARIA G. CRUZ-MUNIZ a/k/a “MARTA,” CARLOS A. MARTINEZ-ACOSTA,**

**CHARLOTTA TODD-PEPPARD, and TODD PEPPARD**, knowingly and intentionally conspired and agreed with each other and others, known and unknown to the Grand Jury, to distribute 50 grams or more of a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841 (a)(1) and (b)(1)(B).

**COUNT 2**

On or about August 9, 2013, in Taney County, in the Western District of Missouri, the defendants, **JAIME VELASQUEZ-LUVIANO a/k/a JAIME LUVIANO-BENITEZ a/k/a “COLUMBIA,” MARIA G. CRUZ-MUNIZ a/k/a “MARTA,”** and **CARLOS A. MARTINEZ-ACOSTA**, aiding and abetting each other and others, known and unknown to the Grand Jury, knowingly and intentionally distributed a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT 3**

On or about August 15, 2013, in Taney County, in the Western District of Missouri, the defendants, **JAIME VELASQUEZ-LUVIANO a/k/a JAIME LUVIANO-BENITEZ a/k/a “COLUMBIA,” MARIA G. CRUZ-MUNIZ a/k/a “MARTA,”** and **CARLOS A. MARTINEZ-ACOSTA**, aiding and abetting each other and others, known and unknown to the Grand Jury, knowingly and intentionally distributed a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

#### **COUNT 4**

On or about August 23, 2013, in Taney County, in the Western District of Missouri, the defendants, **JAIME VELASQUEZ-LUVIANO a/k/a JAIME LUVIANO-BENITEZ a/k/a “COLUMBIA,” MARIA G. CRUZ-MUNIZ a/k/a “MARTA,”** and **CARLOS A. MARTINEZ-ACOSTA**, aiding and abetting each other and others, known and unknown to the Grand Jury, knowingly and intentionally distributed a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

#### **COUNT 5**

On or about September 4, 2013, in Taney County, in the Western District of Missouri, the defendants, **JAIME VELASQUEZ-LUVIANO a/k/a JAIME LUVIANO-BENITEZ a/k/a “COLUMBIA”** and **CARLOS A. MARTINEZ-ACOSTA**, aiding and abetting each other and others, known and unknown to the Grand Jury, knowingly and intentionally distributed a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

#### **COUNT 6**

On or about September 30, 2013, in Taney County, in the Western District of Missouri, the defendants, **JAIME VELASQUEZ-LUVIANO a/k/a JAIME LUVIANO-BENITEZ a/k/a “COLUMBIA,” MARIA G. CRUZ-MUNIZ a/k/a “MARTA,”** and **CARLOS A. MARTINEZ-ACOSTA**, aiding and abetting each other and others, known and unknown to the Grand Jury, knowingly and intentionally distributed a mixture or substance containing

methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

#### **COUNT 7**

On or about November 18, 2013, in Taney County, in the Western District of Missouri, the defendants, **JAIME VELASQUEZ-LUVIANO a/k/a JAIME LUVIANO-BENITEZ a/k/a “COLUMBIA,” CHARLOTTA TODD-PEPPARD, and TODD PEPPARD**, aiding and abetting each other and others, known and unknown to the Grand Jury, knowingly and intentionally possessed with the intent to distribute 50 grams or more of a mixture or substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841 (a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

#### **FORFEITURE ALLEGATION**

The allegations contained in Count One above are hereby incorporated as though fully set forth herein for the purpose of charging criminal forfeiture to the United States of America pursuant to Title 21, United States Code, Section 853.

As a result of committing the controlled substance offense alleged in Count One of this Indictment **JAIME VELASQUEZ-LUVIANO a/k/a JAIME LUVIANO-BENITEZ a/k/a COLUMBIA,”** shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from any proceeds obtained directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner

or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

1. Approximately \$884 in United States Currency seized on November 19, 2013.

A TRUE BILL

/s/  
FOREPERSON OF THE GRAND JURY

/s/ Gary Milligan  
Gary Milligan  
Assistant United States Attorney

DATED: 12/17/2013  
Springfield, Missouri